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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**Adam Titus # R-43512.

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: 1-23-CV-02036
(To be supplied by the Clerk of this Court)Placement officer ThorntonWarden GomezMaintenance Supervisor John/Jane DoeCorrectional officer John Doe #1Correctional officer John Doe #2Correctional officer John Doe #3 continued on page #1A

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:**AMENDED COMPLAINT**☒**COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)**☐**COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)**☐**OTHER (cite statute, if known)*****BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.***

correctional officer John DOE #4
correctional officer John DOE #5
correctional officer Jane DOE #6
correctional officer John DOE #7
correctional officer John DOE #8
correctional officer Jane DOE #9
correctional officer John DOE #10
correctional officer John DOE #11
correctional officer Jane DOE #12
correctional officer John DOE #13
correctional officer John DOE #14
correctional officer Jane DOE #15
correctional officer John DOE #16
correctional officer John DOE #17
correctional officer John DOE #18
correctional officer Jane DOE #19
correctional officer Jane DOE #20
correctional officer John DOE #21
correctional officer John DOE #22
correctional officer Jane DOE #23

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

I. Plaintiff(s):

- A. Name: Adam Titus
- B. List all aliases: none
- C. Prisoner identification number: #R-43512
- D. Place of present confinement: Stateville correctional center
- E. Address: P.O. box 112, Joliet, IL, 60434

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: correctional officer Thornton
 Title: Placement
 Place of Employment: Stateville corr center
- B. Defendant: correctional maintenance officer Supervisor ^(Dphw/James Doe)
 Title: Maintenance supervisor
 Place of Employment: Stateville corr center
- C. Defendant: Gomez
 Title: Warden
 Place of Employment: Stateville corr center

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

Continued on
 Page 2A, 2B, 2C

D. Defendant: correctional officer John Doe #1
Title: correctional officer
Place of Employment: Stateville corr center

E. Defendant: correctional officer John Doe #2
Title: correctional officer
Place of Employment: Stateville corr center

F. Defendant: correctional officer Jane Doe #3
Title: correctional officer
Place of Employment: Stateville corr center

G. Defendant: correctional officer John Doe #4
Title: correctional officer
Place of Employment: Stateville corr center

H. Defendant: correctional officer John Doe #5
Title: correctional officer
Place of Employment: Stateville corr center

I. Defendant: correctional officer Jane Doe #6
Title: correctional officer
Place of Employment: Stateville corr center

J. Defendant: correctional officer John Doe #7
Title: correctional officer
Place of Employment: Stateville corr center

K. Defendant: correctional officer John Doe #8
Title: correctional officer
Place of Employment: Stateville corr center

L. Defendant: correctional officer Jane DOE #9
Title: correctional officer
Place of Employment: Stateville corr center

M. Defendant: correctional officer John DOE #10
Title: correctional officer
Place of Employment: Stateville corr center

N. Defendant: correctional officer John DOE #11
Title: correctional officer
Place of Employment: Stateville corr center

O. Defendant: correctional officer Jane DOE #12
Title: correctional officer
Place of Employment: Stateville corr center

P. Defendant: correctional officer John DOE #13
Title: correctional officer
Place of Employment: Stateville corr center

Q. Defendant: correctional officer John DOE #14
Title: correctional officer
Place of Employment: Stateville corr center

R. Defendant: correctional officer Jane DOE #15
Title: correctional officer
Place of Employment: Stateville corr center

S. Defendant: correctional officer John DOE #16
Title: correctional officer
Place of Employment: Stateville corr center

1. Defendant: correctional officer John DOE #17
Title: correctional officer
Place of Employment: Stateville corr center

U. Defendant: correctional officer John DOE #18
Title: correctional officer
Place of Employment: Stateville corr center

V. Defendant: correctional officer Jane DOE #19
Title: correctional officer
Place of Employment: Stateville corr center

W. Defendant: correctional officer Jane DOE #20
Title: correctional officer
Place of Employment: Stateville corr center

X. Defendant: correctional officer John DOE #21
Title: correctional officer
Place of Employment: Stateville corr center

Y. Defendant: correctional officer John DOE #22
Title: correctional officer
Place of Employment: Stateville corr center

Z. Defendant: correctional officer Jane DOE #23
Title: correctional officer
Place of Employment: Stateville corr center

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Adam Titus v. Aaron Stett-Cox, Nicholas Bryan, Dustin Hager, Martin Matherly, Shawn Thrush, and David Underwood - 4:16-cv-04251
- B. Approximate date of filing lawsuit: November 22, 2016
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
- D. List all defendants: Aaron Stett-Cox, Nicholas Bryan, Dustin Hager, Martin Matherly, Shawn Thrush, and David Underwood
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Central District
- F. Name of judge to whom case was assigned: Colin Stirling Bruce
- G. Basic claim made: Excessive Force, Failure to Intervene, deliberate indifference. *continued on page 3A*
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): May 4, 2018, yes, no appeal, no.
- I. Approximate date of disposition: May 4, 2018 *continued on page 3A*

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

On June 9, 2016, Subjected him to Excessive force failure to intervene And deliberate indifference. As Plaintiff asked C.O. Hodgeman if he could speak to an Supervising officer about the Extreme heat, And was denied then Hodgeman left and defendant Cox arrived and told Plaintiff to cuff up, then the Plaintiff asked to speak to a lieutenant. Then Cox sprayed the Plaintiff in the face with a chemical Agent then members of Tact team arrived slammed Plaintiff to the ground and began punching the Plaintiff even though the Plaintiff was in handcuffs and not combative.

A. name of case and docket number
Plaintiff, Adam Titus
Defendants, Klauschwaal - 1:17-cv-01535

B. approximate date of filing lawsuit: November 28, 2017

C. list all Plaintiffs: Adam Titus

D. list all Defendants: Klauschwaal, Doctor Tilden, nurse
Shawna, nurse Jane Doe #1, mental Health John Doe #1-8
med-tech Jane Doe #1 et AL.

E. court in which the lawsuit was filed (if federal
court, name the district; if state court, name the county);
central District

F. name of Judge to whom case was assigned:
micheal m. mitch

G. Basic claim made: Excessive force, deliberate
indifference, Plaintiff was being escorted by Defendant
Klauschwaal who was pushing Plaintiff as they walked
when they reached the stairs Plaintiff asked Defendant
Klauschwaal to stop pushing him as he had extreme
back pain, as Plaintiff was descending the stairs
Defendant pushed Plaintiff down the stairs, then
Plaintiff was taken to healthcare where defendants
nurse Shawna and nurse Jane Doe left Plaintiff
to sit in pain and other defendant's "Jane and John
Doe" then Plaintiff was seen by defendant Dr. Tilden
page 3B

several hours later and denied medical treatment and food as he was admitted to the Healthcare unit and kept from December 13 through 16, 2016. Then Plaintiff states that on December 16, 2016, C.O. John Doe¹ came to Healthcare entered Plaintiff's cell and forced him to the ground. Then picked him up by the arms and dropped Plaintiff to the floor.

H. Disposition of this case was the case dismissed? was it appealed? is it still pending? still pending, then it was dismissed.

I. Approximate date of disposition: ~~was~~ 1-14-20

A. Name of case and docket number
Plaintiff, Adam Titus
Defendants, Jacob A. McDonald,
4-17-cv-04004

B. Approximate date of filing lawsuit: January 9, 2017

C. List all Plaintiffs: Adam Titus

D. List all Defendants: Jacob A. McDonald, Coley Smith

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county); Central District

F. Name of Judge to whom case was assigned: Sue E. Myerscough

G. Basic claim made: Excessive force, deliberate indifference, failure to intervene Plaintiff was escorted by defendants to his cell, as Plaintiff entered the cell Defendant McDonald shoved Plaintiff to the floor by grabbing him by the back of the neck. Then both Defendant Denied Plaintiff medical treatment after Plaintiff requests and failure to intervene on Defendant Smith.

H. Disposition of this case was the case dismissed? was it appealed? is it still pending? still pending.

L. Approximate date of disposition: N/A

A. name of case and docket number

Plaintiff Adam Titus

Defendants Kyle Kent

1:17-CV-01249

B. approximate date of filing lawsuit: June 2, 2017

C. list all Plaintiffs: Adam Titus

D. list all Defendants: Kyle Kent, se Kayi Baptist,
Shawna Joneson, Weston Gresham, Christopher B. Baker,
James Boland, Leo Smith, Terry Johnson, Heather Mary,
Jodi Monroe, Steven Horton, Aaron Rhoades, Robert Snyder,
Shelton Williams, Jod Newkirk, Brian Bilos, mental
Health Jane Doe #1, mental Health Jane Doe #2.

E. court in which the lawsuit was filed (if
federal court, name the district: if state court
name the county): central District

F. name of Judge to whom case was assigned:
Sue E. Myerscough

G. Basic claim made: Excessive Force, deliberate
indifference. Plaintiff states Defendant Kent on
1-4-17 applied handcuffs tightly and then punched
Plaintiff in the back while escorting Plaintiff down
the stairs causing Plaintiff to fall. The Plaintiff
was restrained on a bench for over seven hours
as Plaintiff urinated and defecated on himself.
The next day Plaintiff was denied his pain

medication by C.O. many.

H. Disposition of this case, was the case dismissed?
was it appealed? is it still pending? } still pending

I. Approximate date of disposition: N/A

A. Name of case And docket number

Plaintiff, Adam Titus

Defendants, David Mitchell, C.O. John Doe's #1-9

Mental Health Jane Doe #1, med-tech Jane Doe #1-3,

Sergeant John Doe #1, Wexford Health Services et. AL,

3:17-cv-01297

B. Approximate date of filing lawsuit: November 30, 2017

C. list all Plaintiffs: Adam Titus

D. list all Defendants: David Mitchell, C.O. John Doe's #1-9
Mental Health Jane Doe #1, med-tech Jane Doe #1-3, Sergeant
John Doe #1, Wexford Health Services et. AL

E. court in which the lawsuit was filed (if
Federal court, name the district; if state court,
name the county); Southern District

F. name of Judge to whom case was assigned;
Nancy S. Rosenstengel

G. Basic claim made: Excessive force, deliberate
indifference Plaintiff states that on June 16, 2017,
Plaintiff was tackled by three prison guards John
Doe's and slammed to the ground. Then Plaintiff
was restrained and John Doe Defendants punched
Plaintiff in the face, back repeatedly while covering
the handcuffs while placing Plaintiff in a headlock
and twisting Plaintiff's wrist. Then Lieutenant
Mitchell walked up and kicked Plaintiff in the
face and grabbed him by the leg and twisted

it. Then Plaintiff was taken to healthcare by C.O. John DOE as Plaintiff requested medical attention. Then Plaintiff was seen by nurses as a group of guards "C.O.'s" entered and began to punch and knee Plaintiff in the back, face and head. Then Plaintiff was dragged to the front of segregation as three prison guards kneed and punched Plaintiff while calling Plaintiff derogatory names. Plaintiff was taken to the shower and requested medical attention to John DOE's C.O.'s. Then Plaintiff was placed in a cell as John DOE's C.O.'s took Plaintiff to med-tech's as Plaintiff tried to explain his injuries but was ignored. Then Plaintiff was taken to my cell while C.O.'s twisted Plaintiff's wrist and Plaintiff requested medical treatment.

H. Disposition of this case, was the case dismissed? was it appealed? is it still pending?)
Still pending

I. approximate date of disposition: n/a

A. name of case and docket number
Plaintiff, Adam litus
Defendants, melvin.
1:18-CV-01094

B. Approximate date of filing lawsuit: march 5, 2018

C. list all Plaintiffs: Adam litus

D. list all Defendants: melvin, Steven mead,
TRT John Doe, et. AL

E. court in which the lawsuit was filed (if
federal court, name the district; if state court,
name the county); central district

F. name of Judge to whom case was assigned:
James E. Shadid

G. On June 16, 2017 Plaintiff was transferred and subjected
to excessive force and cruel and unusual punishment
by Pontiac correctional center officers as he was
transported and was forced into a small metal box
on top of two other inmates plaintiff complained
and his complaints were ignored as the TRT officers
taunted, harassed and drove recklessly in the van
causing pain on Plaintiff physically as he was
being tossed around in the box of the van, as well
as the restraints while on flight. Then on June 17, 2017
plaintiff arrived at Pontiac correctional center

And tried to explain his injuries and was ignored
then Plaintiff was escorted by IRT member, as he twisted in
Plaintiff's handcuffs causing pain on Plaintiff as Plaintiff
stumbled, next Plaintiff entered the cell and then
IRT member slammed Plaintiff's face into the ground
before he exited the cell. Plaintiff requested
medical attention. Plaintiff sustained physical
injuries and mental.
H. Disposition of this case, was the case
dismissed? was it appealed? is it still
pending? went to trial and was dismissed
Plaintiff is appealing and denied

I. Approximate date of disposition? June 8, 2022

A. name of case and docket number

Plaintiff: Adam Titus

Defendants: DOE's 10-20 et al - 3:17-cv-01315

B. Approximate date of filing lawsuit:

C. List all Plaintiffs: Adam Titus

D. List all Defendants: DOE's 10-20, Major Westfall, C.O. Carson, C.O. Weaver, C.O. Webb, Lieutenant Samuels,

E. court in which the lawsuit was filed (if federal court, name the district; if state court, name the county); southern District

F. name of judge to whom case was assigned:
Gilbert C. Sison

G. Basic claim made: Harassment and threats, on April 5, 2017, Plaintiff was transferred to menard. Plaintiff wore an black and white striped jumpsuit, while other inmates had on yellow jumpsuits. As Plaintiff was getting off the bus, C.O. John Doe #10 stated to C.O. John Doe #11, 12, 13, 14, and 15 "we got a stife!" As Plaintiff walked toward these guards they got in his face and told him, "this is menard, we going to beat your ass down here." C.O. John Doe #10 then told another officer to "stamp his brains out," if Plaintiff talked and did anything. On April 10, 2017, when Plaintiff was let out to chow, C.O. John Doe #16, 17, 18, 19, 20 were standing amongst the tables blocking the exit.

As Plaintiff walked toward the prison guards, they harassed him called him derogatory names and threatened him with physical harm due to his being a black and steeper.

H. Disposition of this case was the case dismissed? was it appealed? is it still pending? settled out

I. Approximate date of disposition: 10-14-21

A. name of case and docket number Adam Titus v. John/Jane DOE'S
Plaintiff: Adam Titus NO. 23-CV-05548
Defendants: John / Jane DOE'S

B. approximate date of filing lawsuit: August 15, 2023

C. list all Plaintiffs: Adam Titus

D. list all Defendants: Nurse Jane/John DOE'S etc
Correctional officer's John/Jane Doe's etc, Lieutenant John/Jane Doe's etc
E. court in which the lawsuit was filed (if federal
court, name the district; if state court, name the
county): Northern District

F. name of Judge to whom case was assigned:
Judge Kness

G. Basic claim made: conditions of confinement
between June 12, 2021 and July 5, 2021, hot
temperatures in cell house, windows were double
paned glass windows which increased the hot temperatures
and the windows were nailed shut in Edward
house and in other cell house had modified
circular fans and Edward house did not and
E-house had an infestation of roaches, flies and
other vermin and dust that filled the air
as well as brown sink water as plaintiff was
double celled for up to 24 hours a day. Plaintiff
complained to prison staff and wrote letters
with no results.

H. Disposition of this case was the case dismissed?
was it appealed? is it still pending? Initial
stages of complaint.

I. Approximate date of disposition: N/A

A. name of case and docket number Adam Titus v. Mead
Plaintiff: Adam Titus 1:23-cv-05656
Defendants: Mead et. AL

B. Approximate date of filing lawsuit: August 18, 2023

C. List all Plaintiffs: Adam Titus

D. List all Defendants: Mead et. AL

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District

F. name of judge to whom case was assigned:

G. Basic claim made: ~~Allegedly~~ pro se plaintiff was retaliated against by (FBI Mead) in an cell shake down and Mead destroyed plaintiff's legal papers that included Plaintiff's lawsuit against Mead, on September 30, 2021.

H. Disposition of this case, Initial stages of complaint.

I. Approximate date of disposition: n/A

Statement of claim

All Defendant's that are named John and Jane Doe's are the Illinois Department of Corrections Employees assigned to the Stateville Correctional Center. The John and Jane Doe's are defendants who refuses to wear their Identification cards as required preventing prisoners to know their names to file grievances, in this complaint Grievant describes each John and Jane Doe's Defendants to best describe each defendant and the date each defendant worked with an detailed description of each defendant as stated in the Grievance as to an identity of each Defendant.

This is a civil rights complaint under 42 USC 1983 filed by the Plaintiff Adam Niles #R-43512 prose. A state of Illinois Prisoner states his united states constitution rights were violated and a deprivation under the 8th amendment where Prison officials failed to protect Plaintiff's health and safety, where his conditions of confinement was not humane subjecting Plaintiff to an condemned cell with a non-operable toilet and sink, and Plaintiff was denied any alternative to use the bathroom or have drinking water, as Plaintiff remained in cell for up to 24 hours each day with no other access to toilet and sink water. Plaintiff suffered from stomach pain, headaches, blurred vision, dizziness, nauseated vomiting, breathing issues resulting in cruel and unusual punishment as Plaintiff had to stay in that cell up to 24 hours because

Facts common to All counts

1. on April 8, 9, 10, 11, 12, 13 of 2021, while at stateville correctional center, Plaintiff was subjected to An Eighth Amendment violation cruel and unusual punishment and deliberate indifference to Plaintiff's living conditions.
2. Plaintiff was placed in "Edward house" in cell #7, 02, Plaintiff toilet, and sink was completely shut off and did not work at all as Plaintiff tried to flush the toilet the button did not work.
3. as Plaintiff tried to push the hot and cold water buttons each button did not work and the water from the sink came out in small drips and the toilet had feces and urine in it, that gave the cell an feces and urine smelled odor.
4. After noticing the cell conditions, Plaintiff called correctional officers John DOE #1, height 5'8, weight 170, Bald head, John DOE #2, height 5'9, weight around 180, Bald head, Jane DOE #3 height around 5'6, weight 185, John DOE #4, height 5'10, weight 195 Black hair, John DOE #5, height 5'8, weight 175 Black hair, John DOE #6, height 5'9, weight 190 Black hair, Jane DOE #7, height 5'6, weight 170, John DOE #8, height 5'7, weight 160, John DOE #9 height 5'8, weight 160, Jane DOE #10, height 5'9, weight 175, John DOE #11, height 5'9, weight 175 Jane DOE #12, height 5'6, weight 158, Black hair, John DOE #13, height 5'9, weight 190, Black hair, John DOE #14, height 5'8, weight 180, Dark hair

Jane DOE #15, height 5'10, weight around 150
 Black hair, John DOE #16, height 5'9, weight 190
 Baldhead, John DOE #17, height 5'10, weight 178
 Black hair, John DOE #18, height 5'6, weight 185,
 Jane DOE #19, height 5'6, weight 170, DARK hair, Jane
 DOE #20, height 5'2, weight 160, John DOE #21, height
 5'9, weight 185, DARK hair, John DOE #22, height 5'9,
 weight 180, DARK hair, Jane DOE #23, height 5'6,
 weight 140, Black hair.

5. Plaintiff then explained to correctional officers that
 his toilet completely did not work of neither
 flushed or had any pressure coming from the buffer
 as well as the hot and cold water buttons from
 the sink did not work.

6. To further, Plaintiff complained of the feces and
 urine smell that filled the cell from the inoperable
 toilet.

7. Due to the inhumane conditions Plaintiff suffered
 from headaches, stomach pains, dizziness, blurred
 vision and nauseated, vomiting, breathing issues.

8. Plaintiff further complained of needing to use
 the bathroom and a working sink and Plaintiff
 was denied by John and Jane Doe's #1-23

9. Next, Plaintiff asked for a supervisor or to call
 maintenance and have it fixed or have Plaintiff
 moved to an adequate working cell and correctional
 officers John and Jane Doe's #1-23 stated "welcome

to E-house" they fix it when they want, And they will not move you.

10. Plaintiff wrote letters to the Placement officer Thornton, maintenance supervisor John/Jane DOE And warden Gomez and asked each prison official to be moved. Plaintiff never received an response neither his conditions changed as Plaintiff was subjected to these conditions up to 24 hours each day.

Count 1 - Cruel And Unusual Punishment

11. Plaintiff re-alleges the allegations in paragraphs 1-10 of the "facts common to all counts".

12. As a citizen of the United States, Plaintiff has a right under the Constitution to be free from cruel and unusual punishment.

13. Correctional officers, defendants, including but not limited to correctional officers John and Jane DOE # 1-23, And Placement officer Thornton, maintenance supervisor John/Jane DOE, And Warden Gomez, Defendants all acted under the color of state law to deprive Plaintiff of his constitutional right of freedom from cruel and unusual punishment in more or more of the following ways:

A. Subjecting Plaintiff to an Inhumane cell with an Inoperable toilet and sink.

B. Subjecting Plaintiff to an Inhumane living condition as feces and urine filled the toilet and Plaintiff had to inhale the foul odor each day up to 24 hours

C. Subjecting Plaintiff to an Inhumane cell for up to 24 hours each day without use of the toilet or sink.

D. Subjecting Plaintiff to an Inhumane cell with no other way to use or have access to a toilet or sink

E. Subjecting Plaintiff to an Inhumane cell with no other way to use a sink or have access to water.

14. Correctional officers, Defendant's John And Jane DOE's #1-23 And Defendant's Placement officer Thornton, maintenance supervisor John/Jane DOE And warden Gomez acted in their individual and official capacity and are personally responsible for their actions, And liable for failure to act for known or obvious conditions as well as failure to train or supervise or to respond to evidence of misconduct, and are officially responsible for the acts of others.

15. Correctional officers, Defendants John And Jane DOE's #1-23 And Defendant's Placement officer Thornton, maintenance supervisor, John/Jane DOE And warden Gomez, Defendant's acted maliciously And wantonly to inflict pain upon plaintiff.

16. as a direct And proximate result of the actions of correctional officers, Defendant's correctional officers John And Jane DOE's #1-23 And Defendant's Placement officer Thornton, maintenance supervisor John/Jane DOE And warden Gomez, Defendant's Plaintiff has suffered Physical, mental And emotional damages.

17. As a direct and proximate result of correctional officers Defendant's, correctional officer's John And Jane DOE's #1-23, And Defendant's Placement officer Thornton, maintenance supervisor John/Jane DOE And warden Gomez, Defendant's actions Plaintiff has suffered And continues to suffer injuries.

18. as a direct and proximate result of correctional officers, Defendant's correctional officers John And Jane Doe's #1-23, And Defendant's Placement officer Thornton, maintenance supervisor John/Jane Doe And warden Gomez, Defendant's actions, Plaintiff has had his constitutional rights violated.

Wherefore, Plaintiff Adam Titus respectfully requests monetary damages and any other relief the court deems fair and justified to compensate Plaintiff for the violation of his constitutional rights and the injuries that he suffered at the hands of Defendants in violation of the Eighth and fourteenth Amendments of the United States Constitution.

Count 2 - Cruel And unusual Punishment
Deliberate Indifference

19. Plaintiff re-alleges the allegations from paragraphs 1-10 of the "facts common to all counts"

20. as a citizen of the United States, Plaintiff has a right to be free from cruel and unusual punishment

21. Plaintiff suffered a series of objectively serious physical and mental, emotional injuries during the inhumane conditions, such as, stomach pains, headaches, dizziness, blurred vision, breathing pains and vomiting.

22. Correctional officers, Defendant's correctional officers John And Jane Doe's #1-23, And Defendant's Placement officer Thornton, maintenance supervisor John/Jane Doe

and warden Gomer all acted under the color of state law to deprive Plaintiff of his constitutional right of freedom from cruel and unusual punishment in more or more of the following ways:

A. Ignoring Plaintiff's request to use the bathroom and sink.

B. Ignoring Plaintiff's request to be moved or have the toilet and sink fixed.

C. Ignoring Plaintiff's letters to be moved as it caused physical and mental injuries.

D. Ignoring Plaintiff's letters of repeated cries for help to be moved or have it fixed by attempt of notice.

E. Ignoring Plaintiff's letters of repeated cries for help and the physical and mental injuries he suffered by each day.

F. Refusing to move Plaintiff or remedy the situation in any way.

G. Failing to establish appropriate procedures for aiding an inmate in serious inhumane living conditions.

H. Failing to instruct IDOC employees to recognize when an inmate is in inhumane living conditions and is suffering with physical and mental injuries from those conditions and remedy it.

I. Failing to hold supervisory role of knowledge of present conditions or remedy it.

23. All defendants named in this count acted in a deliberate and/or reckless manner by ignoring and/or refusing to remedy Plaintiff's Inhumane living conditions.
24. As a direct and proximate result of the actions of all Defendants in the count Plaintiff continues to suffer physical and mental injuries.
25. as a direct and proximate result of the actions of all Defendants in this count, Defendants has had his constitutional rights violated.
- Wherefore, Plaintiff Adam litus respectfully requests monetary damages and any other relief the court deems fair and justified to compensate Plaintiff for the violation of his constitutional rights and the injuries that he suffered at the hands of Defendants for deliberate indifference to Plaintiff's serious Inhumane living conditions in violation of the Eighth and Fourteenth Amendments of the United States Constitution.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Plaintiff Respectfully Demands Trial by Jury
 A. Compensatory damages determined by trier of facts
 B. Punitive damages determined by trier of facts
 C. Such injunctive declaration or other relief as this
 court deems just and proper.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 4 day of Feb, 2024


 (Signature of plaintiff or plaintiffs)

Adam Titus
 (Print name)

R-43512
 (I.D. Number)

Western Illinois Law Center
 Mount Sterling, IL

62353
 (Address)

Grievances &
ARB Responses

Ex¹⁸: A-G

RECEIVED
STATEVILLE C.C.

igned Grievance Institution: EXA Housing Unit: 2 Bed #: 208

JUN 23 2021

ILLINOIS DEPARTMENT OF CORRECTIONS
Offender's Grievance

Lvl rec. 2nd Lvl rec.

to: GRIEVANCE DEPARTMENT (please print): ADAM TITUS ID #: R-43512 Race (optional): BLK

Present Facility: Stateville Corr Center Facility where grievance issue occurred: Stateville Corr Center

Nature of grievance:

☐ Personal Property ☐ Mail Handling ☐ Medical Treatment ☐ ADA Disability Accommodation 2021

☒ Staff Conduct ☐ Dietary ☐ HIPAA ☐ Restoration of Sentence Credit

☐ Transfer Denial by Facility ☒ Other (specify): conditions of confinement etc.

☐ Disciplinary Report

Date of report: _____ Facility where issued: _____

Note: Protective Custody Denials may be grieved immediately via the local administration on the protective custody status notification.

Complete: Attach a copy of any pertinent document (such as a Disciplinary Report, Search Record, etc.) and place in the designated receptacle marked "grievance":

Counselor, unless the issue involves discipline, is deemed an emergency, or is subject to review by the Administrative Review Board Grievance Officer, only if the issue involves discipline at the present facility or issue not resolved by Counselor

Chief Administrative Officer, only if EMERGENCY grievance

Mail to Administrative Review Board, only if the issue involves protective custody, involuntary administration of psychotropic drugs, issues from another facility except medical and personal property issues, or issues not resolved by the Chief Administrative Officer.

Summary of Grievance (Provide information including a description of what happened, when and where it happened, and the name or identifying information for the person involved):

On the date of April 8, 2021, Grievant resided in Edward house A.K.A. (E-house) in cell # 702, upon residing in that cell Grievant toilet did not work at all as it did not flush and the water pressure from the sink was insufficiently low and came out in small drips and the toilet had feces and urine in it and gave the cell an foul odor. Grievant complained to various staff/C.O.'s about the cell conditions and were asking to be moved as I

☒ Continued on reverse

Relief Requested:

actions at a later date.

Check only if this is an EMERGENCY grievance due to a substantial risk of imminent personal injury or other serious or irreparable harm to self.

Check if this is NOT an emergency grievance.

Curtis ADAM TITUS R-43512 6-9-21

Offender's Signature ID# Date

(Continue on reverse side if necessary)

Counselor's Response (if applicable) Date Received: 6/25/21 ☐ Send directly to Grievance Officer

Outside jurisdiction of this facility. Send to: Administrative Review Board, PO Box 19277, Springfield, IL 62794-9277

Response:

Per, Chief Engineers office, They have not received any recent work orders. Grievant has moved out of Edward 702 on 7/5/21. The current individuals in custody living in cell Edward 702 have not mentioned any toilet issues to this counselor.

T. Scott T. Scott 6/25/21

Print Counselor's Name Sign Counselor's Name Date

Response to offender: If you disagree with the counselor's response, it is your responsibility to forward grievance with counselor's response to the grievance officer.

EMERGENCY REVIEW: Date Received: _____

Is determined to be of an emergency nature:

Yes, expedite emergency grievance

No, an emergency is not substantiated. Offender should submit this grievance according to standard grievance procedure

Chief Administrative Officer's Signature

Date

2nd Ly Rec:

ILLINOIS DEPARTMENT OF CORRECTIONS
 OFFICE OF THE CHIEF CLERK

1974

Assigned Grievance #/Institution:

[Housing Unit:](#)

2

Bed # 102

RECEIVED STATEVILLE C.C.		Housing Unit: <u>45</u>		Bed #: <u>20</u>	
JUN 23 2021		ILLINOIS DEPARTMENT OF CORRECTIONS Offender's Grievance		2nd Lvl rec:	
GRIEVANCE DEPARTMENT (Please print): <u>ST-11</u> <u>Adrian Titus</u>		ID #: <u>R-43512</u>		Race (optional): <u>Blk</u>	
Present Facility: <u>Stateville Corr Center</u>		Facility where grievance issue occurred: <u>Stateville Corr Center</u>			
Nature of grievance:					
<input type="checkbox"/> Personal Property	<input type="checkbox"/> Mail Handling	<input type="checkbox"/> Medical Treatment	<input type="checkbox"/> ADA Disability Accommodation		
<input checked="" type="checkbox"/> Staff Conduct	<input type="checkbox"/> Dietary	<input type="checkbox"/> HIPAA	<input type="checkbox"/> Restoration of Sentence Credit		
<input type="checkbox"/> Transfer Denial by Facility	<input checked="" type="checkbox"/> Other (specify): <u>conditions of confinement etc.</u>				
<input type="checkbox"/> Disciplinary Report					
Date of report			Facility where issued		

Note: Protective Custody Denials may be grieved immediately via the local administration on the protective custody status notification.

Complete: Attach a copy of any pertinent document (such as a Disciplinary Report, Search Record, etc.) and place in the designated marked receptacle marked "grievance":

Counselor, unless the issue involves discipline, is deemed an emergency, or is subject to review by the Administrative Review Board Grievance Officer, only if the issue involves discipline at the present facility or issue not resolved by Counselor Chief Administrative Officer, only if EMERGENCY grievance
Mail to Administrative Review Board, only if the issue involves protective custody, involuntary administration of psychotropic drugs, issues from another facility except medical and personal property issues, or issues not resolved by the Chief Administrative Officer.

Summary of Grievance (Provide information including a description of what happened, when and where it happened, and the name or identifying information for each person involved):

On the date of April 8, 2021, Grievant resided in Edward house "A.K.A" (E-house) in cell #702, upon residing in that cell Grievant toilet did not work at all as it did not flush and the water pressure from the sink was insufficiently low and came out in small drips and the toilet had feces and urine in it and gave the cell a foul odor. Grievant complained to various staff/C.O.'s about the cell conditions and were asking to be moved as I

☒ Continued on reverse

Relief Requested:

celling at a later date.

☐ Check only if this is an EMERGENCY grievance due to a substantial risk of imminent personal injury or other serious or irreparable harm to self.

☐ Check if this is NOT an emergency grievance.

Offender's Signature

ID#

Date

(Continue on reverse side if necessary)

Counselor's Response (if applicable) Date Received: 6/25/21 ☐ Send directly to Grievance Officer

☐ Outside jurisdiction of this facility. Send to: Administrative Review Board, PO Box 19277, Springfield, IL 62794-9277

Response:

Per, Chief Engineers office, they have not received any recent work orders. Grievant has moved out of Edward 702 on 7/5/21. The current individuals in custody living in cell Edward 702 have not mentioned any toilet issues to this counselor.

Print Counselor's Name

Sign Counselor's Name

Date

Note to offender: If you disagree with the counselor's response, it is your responsibility to forward grievance with counselor's response to the grievance officer.

EMERGENCY REVIEW: Date Received:

☐ This determined to be of an emergency nature:

☐ Yes, expedite emergency grievance

☐ No, an emergency is not substantiated. Offender should submit this grievance according to standard grievance procedure

Chief Administrative Officer's Signature

Date

1st Lt. REC
Assigned Grievance Classification:
Housing Unit
Bad 5: 702

Week being told that "volunteering to E-house" they fix it
when they want, and that they will not move you. Grievant
then wrote to the placement officer to be moved and never
got an response (see copy of letter Ex.1). Grievant also wrote
to the maintenance supervisor (see copy of letter Ex.2) and never
got an response. Grievant then wrote to warden Gomez (see copy
of letter Ex.3) and never received an response. Grievant complained
to six correctional staff (1) male, 5'8, 190, black hair, (2) male,
5'9, 190, bald head, (3) female, 5'6, 185, black hair, (4) male, 5'10,
195, black hair, (5) male, 5'8, 175, black hair, (6) male, 5'9, 190, black hair,
(6) female, 5'6, 190, Grievant was denied to be moved as well as fix it.
On the date of 08/19/2021 Grievant again complained about
his toilet not flushing or working and the toilet and wine inside
the toilet and the small bowl odor as well as the sink having
issues. Grievant was never given a response coming out in days. Grievant
complained to correctional staff (1) male, 5'7, 160, bald head, (2) male,
5'8, 190, black hair, (3) female, 5'9, 175, black hair, (4) male, 5'9, 175,
black hair, and was told by all staff (they do what they want
Grievant asked to be moved and was denied. Grievant
wrote to placement officer, maintenance supervisor, and
warden Gomez, see copies of letter Ex.1, Ex.2, Ex.3) and never received
an response.
On the date of 08/11/2021 Grievant again complained about his toilet
not flushing or working and the toilet and wine inside the toilet and the
small bowl odor as well as the sink having issues. Grievant
complained to correctional staff (1) male, 5'7, 160, bald head, (2) male,
5'8, 190, black hair, (3) male, 5'8, 180, black hair, (4) female, 5'9, 190,
black hair, and was told that (I don't think they care for it).
Grievant asked to be moved and was denied. Grievant wrote to
placement officer, maintenance supervisor, and warden Gomez, see copies of letter
Ex.1, Ex.2, Ex.3) and never received an response.
On the date of 08/11/2021 Grievant again complained about his toilet
not flushing or working and the toilet and wine inside the toilet and the
small bowl odor as well as the sink having issues. Grievant
complained to correctional staff (1) male, 5'7, 160, bald head, (2) male,
5'8, 190, black hair, (3) male, 5'8, 180, black hair, (4) female, 5'9, 190,
black hair, and was told that (I don't think they care for it).
Grievant asked to be moved and was denied. Grievant wrote to
placement officer, maintenance supervisor, and warden Gomez, see copies of letter
Ex.1, Ex.2, Ex.3) and never received an response.

State of Illinois - Department of Corrections
Counseling Summary

IDOC #	R43512	Counseling Date	06/28/21 07:23:35:390
Offender Name	TITUS, ADAM	Type	Collateral
Current Admit Date	05/06/2005	Method	Grievance
MSR Date	12/23/2039	Location	STA GRIEVANCE OFFICER
HSE/GAL/CELL	E -07-02	Staff	GOMEZ, AMY, Correctional Counselor II

RECEIPT OF GRIEVANCE ON 6/23/2020 CONCERNING CONDITIONS. THIS GRIEVANCE HAS BEEN ASSIGNED GRIEVANCE #951 AND WILL BE REVIEWED AND RESPONDED TO BY THE COUNSELOR.

State of Illinois - Department of Corrections
Counseling Summary

IDOC #	R43512	Counseling Date	10/03/21 08:30:36:697
Offender Name	TITUS, ADAM	Type	Collateral
Current Admit Date	05/06/2005	Method	Grievance
MSR Date	12/23/2039	Location	STA GRIEVANCE OFFICER
HSE/GAL/CELL	D -09-52	Staff	MCBEE, ANNA, Correctional Counselor II

GRIEVANCE #951 WAS RECEIVED ON _10/1/21_ BY THE GRIEVANCE OFFICE FOR REVIEW AND RESPONSE BY GRIEVANCE OFFICER.

ed-e
D952

ILLINOIS DEPARTMENT OF CORRECTIONS
RESPONSE TO OFFENDER'S GRIEVANCE

Grievance Officer's Report

Date Received: 10/01/2021 Date of Review: 01/05/2022 Grievance # (optional): 951
Offender: Adam Titus ID#: R43512

Nature of Grievance:
Conditions

Facts Reviewed:

Grievant claims on a grievance written 6/9/21 that while in E702, his toilet did not work and he has low water pressure.

Grievance Officer finds according to Counselor Scott, according to the Chief Engineer's Office, no work orders were received for the above issue. Grievant was moved out of the cell on 7/5/21. The current residents of the cell have not mentioned any issues with the toilet to the him (Counselor Scott).

Recommendation:

Grievance is MOOT.

Anna McBee

Print Grievance Officer's Name

Grievance Officer's Signature

(Attach a copy of Offender's Grievance, including counselor's response if applicable)

Chief Administrative Officer's Response

Date Received: 1/18/22 ☒ I concur ☐ I do not concur ☐ Remand

Action Taken:

Chief Administrative Officer's Signature

Date

Offender's Appeal To The Director

I am appealing the Chief Administrative Officer's decision to the Director. I understand this appeal must, within 30 days after the date of the Chief Administrative Officer's decision, be received by the Administrative Review Board, P.O. Box 19277, Springfield, IL 62794-9277. (Attach a complete copy of the original grievance, including the counselor's response if applicable, and any pertinent documents.)

Offender's Signature

ID#

Date

Inmate Id:	R43512	Ret Form Ind:	
Name:	TITUS, ADAM	Modify Ind:	
Chair Code:	SHBE	Deny Ind:	
Grv Type:	L	Favorable Ind:	
Grv Code:	CONDITIONS	Deferred Ind:	
Receive Date:	01/21/2022	Moot Ind:	
Hearing Date:	00/00/0000	Grievance Number:	951
Mailing Date:	00/00/0000	Incident Number:	
Grv Loc:	STATEVILLE CC	Incident Date:	00/00/0000
Hearing Loc:	STATEVILLE CC	Incident Inst:	
		Date Received:	01/24/2022
Comments:	GRV #951 ALLEGES TOILET DID NOT WORK AND LOW WATER PRESSURE (4/8/21 - CELL 702 E-HOUSE)		

J.B. Pritzker
Governor



Rob Jeffreys
Director

The Illinois Department of Corrections

1301 Concordia Court, P.O. Box 19277 • Springfield, IL 62794-9277 • (217) 558-2200 TDD: (800) 526-0844

Name: Titus, Adam

1/26/22

Date

ID#: R43512

Facility: Stateville

This is in response to your grievance received on 1/21/22. This office has determined the issue will be addressed without a formal hearing. A review of the Grievance, Grievance Officer/CAO response to the grievance has been conducted. For a grievance that is direct review by the ARB, a review of the Grievance has been conducted.

Your issue regarding: Grievance dated: 6/9/21 Grievance Number: 951 Griev Loc: STA

- ☐ Transfer denied by the Facility
- ☐ Dietary
- ☐ Personal Property
- ☐ Mailroom/Publications
- ☐ Assignment (job, cell)
- ☐ Commissary / Trust Fund
- ☒ Conditions (cell conditions, cleaning supplies, etc.) Cell 7:02, toilet issues 4/8/21
- ☐ Disciplinary Report: Dated: Incident #
- ☒ Other Claims reported issues with toilet several times throughout April

Based on a review of all available information, this office has determined your grievance to be:

- ☐ Affirmed, Warden is advised to provide a written response of corrective action to this office by
- ☐ Denied, in accordance with DR504F, this is an administrative decision.
- ☒ Denied, this office finds the issue was appropriately addressed by the facility Administration.
- ☐ Denied as the facility is following the procedures outlined in DR525.
- ☐ Denied as procedures were followed in accordance with DR 420 for removal/denial from/for an assignment.
- ☐ Denied as this office finds no violation of the grievant's due process in accordance with DR504.80 and DR504.30. This office is reasonably satisfied the offense cited in the report was committed.
- ☒ Other: These claims were not substantiated. Additionally, records reviewed by this office reflect you were seen "face to face" while in this cell (3/30/21 to 7/5/21) fourteen (14) times, with no toilet issues being stated.

FOR THE BOARD:

Sherry Benton
Sherry Benton
Administrative Review Board

CONCURRED:

Rob Jeffreys
Rob Jeffreys
Director

CC: Warden, Stateville Correctional Center
Titus, Adam ID# R43512

Mission: To serve justice in Illinois and increase public safety by promoting positive change for those in custody, operating successful reentry programs, and reducing victimization.

Affidavits

AFFIDAVIT

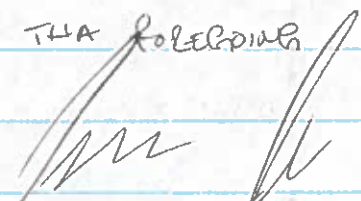
I, ERIC CARSON ID# M18899 ~~do~~ HEREBY DECLARE THAT I HAVE PERSONAL KNOWLEDGE OF THE FACTS SET FORTH HEREIN THAT I AM COMPETENT TO TESTIFY AND IF CALLED TO TESTIFY WOULD STATE AS FOLLOWS:

I, ERIC CARSON ID# M18899 RESIDED IN E-HOUSE AT STATEVILLE CORRECTIONAL CENTER IN CELL # 702 WITH MY CELLMATE ADAM TITUS ID# R43512 ON THE DATE OF APRIL 8, 2021 TO APRIL 14, 2021.

ADAM TITUS ID# R43512 AND I WERE IN CELL # 702 WITHOUT WORKING TOILET, AND WATER PRESSURE (SINK) WAS INSUFFICIENTLY LOW.

WE BOTH TOLD C.O.S (JOHN AND JANE DOE) ABOUT THE CELL CONDITIONS, AND NEEDING TO USE THE BATHROOM. WE WERE DENIED AS WE WERE IN THE CELL AND THE TOILET HAD FECES AND URINE IN THE TOILET AND GAVE THE CELL A POOR ODOR, AS WE WERE BEING DENIED TO ^{BE} MOVED.

PURSUANT TO 28 U.S.C 1746, I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT FOREGOING IS TRUE AND CORRECT.



ID# M18899

RECEIVED
grievance institution: C.C. JUN 23 2021 EX 1A
Housing Unit: 2 Bed #: 202

ILLINOIS DEPARTMENT OF CORRECTIONS
Offender's Grievance

2nd Lvl rec:

GRIEVANCE DEPARTMENT (Please print): Stateville ID #: R-43512 Race (optional): Blk

sent Facility: Stateville Corr Center Facility where grievance issue occurred: Stateville Corr Center

ure of grievance:

☐ Personal Property ☐ Mail Handling ☐ Medical Treatment ☐ ADA Disability Accommodation

☒ Staff Conduct ☐ Dietary ☐ HIPAA ☐ Restoration of Sentence Credit

☐ Transfer Denial by Facility ☒ Other (specify): conditions of confinement etc.

☐ Disciplinary Report

Date of report: _____ Facility where issued: _____

RECEIVED
JUL 1 2021
BY: _____
GRIEVANCE DEPARTMENT

Note: Protective Custody Denials may be grieved immediately via the local administration on the protective custody status notification.

plete: Attach a copy of any pertinent document (such as a Disciplinary Report, Search Record, etc.) and place in the designated ed receptacle marked "grievance":

Counselor, unless the issue involves discipline, is deemed an emergency, or is subject to review by the Administrative Review Board
Grievance Officer, only if the issue involves discipline at the present facility or issue not resolved by Counselor
Chief Administrative Officer, only if EMERGENCY grievance
Mail to Administrative Review Board, only if the issue involves protective custody, involuntary administration of psychotropic drugs,
issues from another facility except medical and personal property issues, or issues not resolved by the Chief Administrative Officer.

Summary of Grievance (Provide information including a description of what happened, when and where it happened, and the name or identifying information for person involved):

on the date of April 8, 2021, Grievant resided in Edward house
a.k.a. (E-house) in cell # 702, upon residing in that cell Grievant
pilot did not work at all as it did not flush and the water
pressure from the sink was insufficiently low and came out in small
drips and the toilet had feces and urine in it and gave the
cell a foul odor. Grievant complained to various staff/C.O.'s
about the cell conditions and were asking to be moved as I

☒ Continued on reverse

of Requested:

Actions at a later date.

Check only if this is an EMERGENCY grievance due to a substantial risk of imminent personal injury or other serious or irreparable harm to self.

Check if this is NOT an emergency grievance.

Curtis R-43512 6-9-21
Offender's Signature ID# Date

(Continue on reverse side if necessary)

Counselor's Response (if applicable) Date Received: 6/25/21 ☐ Send directly to Grievance Officer

Outside jurisdiction of this facility. Send to: Administrative Review Board, PO Box 19277, Springfield, IL 62794-9277

Response:

Per, Chief Engineers office, they have not
received any recent work orders. Grievant has
moved out of Edward 702 on 7/5/21. The
current individuals in custody living in cell Edward
702 have not mentioned any toilet issues to
this counselor.

T. Scott T. Scott 6/15/21
Print Counselor's Name Sign Counselor's Name Date

to offender: If you disagree with the counselor's response, it is your responsibility to forward grievance with counselor's response to the grievance officer.

EMERGENCY REVIEW: Date Received: _____

is determined to be of an emergency nature:

Yes, expedite emergency grievance

No, an emergency is not substantiated. Offender should submit this grievance according to standard grievance procedure

When they want that they will not move you, Grievant
then write to the placement officer to be moved and never
get my response (see copy of letter Ex 1). Grievant also wrote
to the maintenance supervisor (see copy of letter Ex 2) and never
get my response. Grievant then wrote to warden Gomer (see copy
of letter Ex 3) and never received his response. Grievant complained
to six correctional staff (1) male, 5'8, 190, Black hair, (2) male,
5'9, 190, Bald head, (3) female, 5'6, 185, Black hair, (4) male, 5'9, 175,
5'8, 190, Black hair, (5) female, 5'9, 175, Black hair, (6) male, 5'9, 175,
Black hair, and was told by all staff (They do what they want
around here). Grievant asked to be moved and was denied. Grievant
wrote to placement officer, maintenance supervisor, and
warden Gomer, see copies of letter Ex 1, Ex 2, Ex 3 and never received
his response.
On the date of 08/11/2021, Grievant again complained about
his toilet not flushing or working and the feces and urine inside
the toilet and the small foul odor as well as the sink having
insufficiently low water pressure coming out in dips. Grievant
complained to correctional staff (1) female, 5'6, 158, Black hair,
(2) male, 5'9, 190, Black hair, (3) male, 5'8, 180, Black hair, (4) female,
5'9, 190, Black hair, and was told that (I don't think they can fix it).
Grievant asked to be moved and was denied. Grievant again wrote to
placement officer, maintenance supervisor, and warden Gomer, see copies of letter
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On the date of 08/11/2021, Grievant again complained about his toilet
not flushing or working and the feces and urine inside the toilet and the
small foul odor as well as the sink having insufficiently low water
pressure coming out in dips. Grievant complained to correctional staff
(1) male, 5'9, 190, Bald head, (2) male, 5'8, 190, Black hair, (3) male, 5'9,
(4) female, 5'6, 170, Black hair, (5) female, 5'9, 190, Black hair, (6) male, 5'9,
185, Black hair, and was told, I can't do anything about that. Grievant
again asked to be moved and was denied. Grievant again wrote to
placement officer, maintenance supervisor, and warden
Gomer, see copies of letter Ex 1, Ex 2, Ex 3 and never received his response.
On the date of 08/11/2021, Grievant again complained about his toilet
not flushing or working and the feces and urine inside the toilet and the
small foul odor as well as the sink having insufficiently low water
pressure coming out in dips. Grievant complained to correctional staff
(1) male, 5'9, 190, Bald head, (2) male, 5'8, 190, Black hair, (3) male, 5'9,
(4) female, 5'6, 170, Black hair, (5) female, 5'9, 190, Black hair, (6) male, 5'9,
185, Black hair, and was told, I can't do anything about that. Grievant
again asked to be moved and was denied. Grievant again wrote to
placement officer, maintenance supervisor, and warden
Gomer, see copies of letter Ex 1, Ex 2, Ex 3 and never received his response.

Signed: <u>STATEVILLE C.C.</u>		Housing Unit: <u>2</u>		Bed #: <u>20</u>	
JUN 23 2021		ILLINOIS DEPARTMENT OF CORRECTIONS		2nd Lvl rec:	
Lvl rec:		Offender's Grievance			
GRIEVANCE DEPARTMENT (please print):		ID #:		Race (optional):	
ST-21 <u>Adam Titus</u>		<u>R-43512</u>		<u>Blk</u>	
Present Facility:		Facility where grievance issue occurred:			
<u>Stateville Cor Center</u>		<u>Stateville Cor Center</u>			
Nature of grievance:					
<input type="checkbox"/> Personal Property		<input type="checkbox"/> Mail Handling		<input type="checkbox"/> Medical Treatment	
<input checked="" type="checkbox"/> Staff Conduct		<input type="checkbox"/> Dietary		<input type="checkbox"/> HIPAA	
<input type="checkbox"/> Transfer Denial by Facility		<input checked="" type="checkbox"/> Other (specify):		<input type="checkbox"/> Restoration of Sentence Credit	
<input type="checkbox"/> Disciplinary Report		<u>conditions of confinement etc.</u>			
Date of report			Facility where issued		

Note: Protective Custody Denials may be grieved immediately via the local administration on the protective custody status notification.

Complete: Attach a copy of any pertinent document (such as a Disciplinary Report, Search Record, etc.) and place in the designated marked receptacle marked "grievance":

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Mail to Administrative Review Board, only if the issue involves protective custody, involuntary administration of psychotropic drugs, issues from another facility except medical and personal property issues, or issues not resolved by the Chief Administrative Officer.

Summary of Grievance (Provide information including a description of what happened, when and where it happened, and the name or identifying information for each person involved):

On the date of April 8, 2021, Grievant resided in Edward house "A.K.A" (E-house) in cell #702, upon residing in that cell Grievant toilet did not work at all as it did not flush and the water pressure from the sink was insufficiently low and came out in small drips and the toilet had feces and urine in it and gave the cell an foul odor. Grievant complained to various staff/C.O.'s about the cell conditions and were asking to be moved as I

☒ Continued on reverse

Relief Requested:

Actions at a later date.

☐ Check only if this is an EMERGENCY grievance due to a substantial risk of imminent personal injury or other serious or irreparable harm to self.

☐ Check if this is NOT an emergency grievance.

Adam Titus R-43512 6-9-21
Offender's Signature ID# Date

(Continue on reverse side if necessary)

Counselor's Response (if applicable) Date Received: 6/25/21 ☐ Send directly to Grievance Officer

☐ Outside jurisdiction of this facility. Send to: Administrative Review Board, PO Box 19277, Springfield, IL 62794-9277

Response:

Per, Chief Engineers office, They have not received any recent work orders. Grievant has moved out of Edward 702 on 7/5/21. The current individuals in custody living in cell Edward 702 have not mentioned any toilet issues to this counselor.

Print Counselor's Name Sign Counselor's Name Date

Note to offender: If you disagree with the counselor's response, it is your responsibility to forward grievance with counselor's response to the grievance officer.

EMERGENCY REVIEW: Date Received: _____

Is this determined to be of an emergency nature:

☐ Yes, expedite emergency grievance



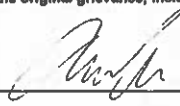
☐ No, an emergency is not substantiated. Offender should submit this grievance according to standard grievance procedure

Chief Administrative Officer's Signature

Date

Assigned Grievance #/Institution:	Housing Unit:	Bed #:	702
1st Lvl rec:	Offender's Grievance	2nd Lvl rec:	

ILLINOIS DEPARTMENT OF CORRECTIONS
RESPONSE TO OFFENDER'S GRIEVANCE

Grievance Officer's Report			
Date Received: 10/01/2021	Date of Review: 01/05/2022	Grievance # (optional): 951	
Offender: Adam Titus		ID#: R43512	
Nature of Grievance: Conditions			
Facts Reviewed: Grievant claims on a grievance written 6/9/21 that while in E702, his toilet did not work and he has low water pressure. Grievance Officer finds according to Counselor Scott, according to the Chief Engineer's Office, no work orders were received for the above issue. Grievant was moved out of the cell on 7/5/21. The current residents of the cell have not mentioned any issues with the toilet to the him (Counselor Scott).			
Recommendation: Grievance is MOOT.			
Anna McBee <small>Print Grievance Officer's Name</small>		 <small>Grievance Officer's Signature</small>	
(Attach a copy of Offender's Grievance, including counselor's response if applicable)			
Chief Administrative Officer's Response			
Date Received: 1/18/22	<input checked="" type="checkbox"/> I concur <input type="checkbox"/> I do not concur <input type="checkbox"/> Remand		
Action Taken:			
 <small>Chief Administrative Officer's Signature</small>		16	1/18/22 <small>Date</small>
Offender's Appeal To The Director			
I am appealing the Chief Administrative Officer's decision to the Director. I understand this appeal must, within 30 days after the date of the Chief Administrative Officer's decision, be received by the Administrative Review Board, P.O. Box 19277, Springfield, IL 62794-9277. (Attach a complete copy of the original grievance, including the counselor's response if applicable, and any pertinent documents.)			
 <small>Offender's Signature</small>		R-43512 <small>ID#</small>	1-11-22 <small>Date</small>

[Redacted Content]